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*Counsel to the Debtor
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

CONGOLEUM CORPORATION,

Debtor.¹

Chapter 11

Case No. 20-18488 (MBK)

BATH IRON WORKS CORPORATION,

Plaintiff

Adv. Pro. No. 20-01439 (MBK)

v.

CONGOLEUM CORPORATION,

Defendant.

¹ The last four digits of the Debtor's federal tax identification number are 8678. The Debtor's corporate headquarters is located at 3500 Quakerbridge Road, Mercerville, New Jersey 08619.

NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER APPROVING A SETTLEMENT AGREEMENT PURSUANT TO FED. R. BANKR. P. 9019 BY AND BETWEEN THE DEBTOR AND BATH IRON WORKS CORPORATION

PLEASE TAKE NOTICE that on December 11, 2020, at 10:00 a.m. (EST), or as soon thereafter as counsel may be heard, the undersigned attorneys for Congoleum Corporation, the within debtor and debtor-in-possession (the “**Debtor**”) shall move before the Honorable Chief Judge Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order approving a settlement agreement pursuant to Fed. R. Bankr. P. 9019 by and between the Debtor and Bath Iron Works Corporation (the “**Motion**”). A hearing on the Motion will be conducted via CourtSolutions and Zoom.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the Declaration of Christopher O'Connor which sets forth the relevant factual and legal bases upon which the relief requested should be granted. As set forth in the Motion, at the hearing, Bath Iron Works Corporation will also present evidence in support of findings of fact and conclusions. A proposed Order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “**General Order**”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “**Supplemental Commentary**”) (the General Order, the Supplemental Commentary and the User's Manual for the Electronic Case Filing System can be found at

www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion if objections are timely filed.

DATED: November 19, 2020

COLE SCHOTZ P.C.
*Counsel to the Debtor
and Debtor in Possession*

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